

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA**

|   |   |                                    |
|---|---|------------------------------------|
| <b>Jane Doe,</b>                              | ) |                                    |
|   | ) |                                    |
| <b>Plaintiff,</b>                             | ) |                                    |
|   | ) | <b>Case No.: 4:24-cv-00299-MTS</b> |
| <b>v.</b>                                     | ) |                                    |
|   | ) |                                    |
| <b>Trackers, Inc. d/b/a PeopleFacts, LLC,</b> | ) |                                    |
|   | ) |                                    |
|   | ) |                                    |
| <b>Defendant.</b>                             | ) |                                    |
| _____   | ) |                                    |

**DEFENDANT PEOPLEFACTS, LLC’S CONSENT MOTION FOR EXTENSION OF  
TIME TO RESPOND TO COMPLAINT**

Defendant PeopleFacts, LLC (“PeopleFacts”), by and through undersigned counsel, respectfully submits this consent motion for a 21-day extension of time to respond to Plaintiff’s Complaint. In support, PeopleFacts states as follows:

1. Plaintiff filed the Complaint on June 24, 2024 [ECF No. 2] and served PeopleFacts on July 2, 2024 [ECF No. 11].
2. The current deadline for PeopleFacts’ response to the Complaint is July 23, 2024.
3. PeopleFacts recently retained undersigned counsel to defend it in this lawsuit and needs additional time to confer with PeopleFacts and investigate Plaintiff’s allegations and formulate a response.
4. In house counsel for PeopleFacts, Curtis Mollohan, has conferred with counsel for Plaintiff concerning this request, and counsel for Plaintiff consents to a 21-day extension.
5. The parties are also discussing whether an early resolution of this case is feasible.
6. This is PeopleFacts’ first request for an extension of time to respond to Plaintiff’s

Complaint, and no prejudice will result from granting the requested extension. Moreover, the requested extension is for good cause and is not designed to delay. Finally, to date there has been no scheduling conference or other deadline scheduled in this matter.

For the foregoing reasons, PeopleFacts respectfully requests that this Court grant this consent motion extending the time to answer or otherwise respond to the Complaint up through and including August 13, 2024. A proposed Order granting this extension is attached hereto.

Dated: July 23, 2024

Respectfully submitted,

/s/ Eric L. Johnson  
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*Attorney for PeopleFacts, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of July 2024, true and correct copies of the foregoing Consent Motion for Extension of Time to Respond to Complaint was electronically served via the Court's CM/ECF system upon the following individuals:

McKenzie Czabaj  
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*Counsel for Plaintiff*

/s/ Eric L. Johnson  
Eric L. Johnson